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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x
:
CONVERIUM HOLDING AG, :
:
Plaintiff, : 07 Civ. 3042 (GEL)
:
- against - :
:
SCOR S.A. AND PATINEX A.G., :
:
Defendants. :
-----x

**DECLARATION OF JOSEPH N. SACCA IN OPPOSITION TO
PLAINTIFF'S MOTION FOR EXPEDITED SCHEDULING AND DISCOVERY**

I, Joseph N. Sacca, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a member of the Bar of this Court and of Skadden, Arps, Slate, Meagher & Flom LLP, attorneys for defendant SCOR S.A. in the above-captioned matter.
2. I submit this declaration in opposition to Plaintiff's Motion For Expedited Scheduling and Discovery, and to place before the Court true and correct copies of the following documents:

Exhibit A: Converium Holding AG 13D, filed on February 21, 2007.

Exhibit B: SCOR Pre-Announcement Press Release, dated February 26, 2007.


Exhibit C: Wilkie Farr & Gallagher LLP Memorandum submitted to Swiss Takeover Board, dated March 5, 2007.

Exhibit D: Wilkie Farr & Gallagher LLP Memorandum submitted to Swiss Takeover Board, dated March 20, 2007.

Exhibit E: Wilkie Farr & Gallagher LLP Memorandum submitted to Swiss Takeover Board, dated March 28, 2007.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
April 19, 2007


Joseph N. Sacca